

### ***Remarks***

Claims 10-27 and 29-35 are presented for reconsideration, with claims 10, 18, and 21 being the independent claims. Claims 10, 17, 18, 21, 25, 27, 30, 32, 34, and 35 are sought to be amended for clarity. Claims 1-9 and 28 stand cancelled without prejudice or disclaimer of the subject matter therein. Applicants reserve the right to prosecute similar or broader claims, with respect to the cancelled and amended claims, in the future. These changes and additions introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

### ***Claim Objections***

On page 2 of the Office Action, claims 30 and 32 were objected to because of informalities. Based on the amendments above to claims 30 and 32, Applicants respectfully request that the Examiner reconsider and withdraw the objection.

### ***Rejection under 35 U.S.C. § 103***

Claims 10-27 and 29-35 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,757,920 to Misra *et al.* ("Misra") in view of U.S. Patent No. 6,421,714 to Rai *et al.* ("Rai"). Applicants respectfully traverse the rejection.

Although Applicants believe there are technical differences between independent claims 10, 18, and 21 and the applied references, for other reasons, and in order to expedite prosecution, Applicants have amended claims 10, 18, and 21. Claims 10, 18, and 21, as amended, recite, among other features, *preventing access to a first one of the first and the second server machine while the user is accessing a second one of the first and the second server machine; wherein the user is disconnected from the first one of the first and the second server machine before being connected to the second one of the first and the second server machine*, or similar language.

The Examiner states on page 4 of the Office Action that Misra does not explicitly indicate this recited feature of claims 10, 18, and 21. To cure this deficiency, the Examiner, on page 4 of the Office Action, relies on Rai (Rai at Col. 6, lines 38-51 and Col. 8, lines 36-44) to allegedly show this feature (emphasis added):

Rai teaches a system of a mobile user where if the user leaves the access point of a first server and enters the access of a second server (Column 6, lines 38-51), the user start issuing commands to the new server and the *system reconfigures the second server to handle the user requests* (Column 8, lines 36-44) and *deletes the user's access to the first server* (Column 8, lines 42-44) thus no access ability to the first server, than access is prevented unless the user is then reconfigured to access the first server.

Rai is used, in the portions stated by the Examiner in columns 6 and 8, to teach conventional handoff techniques for mobile end users who are traveling between areas having different base stations, such that new XTunnels are created and old XTunnels are deleted during the movement. As is known in this conventional technique, this requires that the mobile end user be coupled to at least two base stations at a time, the previous and subsequent, or the connection will be lost during the travel. This is in contrast to the above-noted features of claims 10, 18, and 21, for example, *preventing access to* a first

one of the first and the second server machines while the user is accessing a second one of the first and the second server machines, wherein the user is ***disconnected from the first one*** of the first and the second server machine ***before being connected to the second one*** of the first and the second server machine, as recited using respective language in claims 10, 18, and 21.

Further, the Examiner, in response to Applicants' arguments, on page 8 of the Office Action states (emphasis added):

The examiner disagrees, the combination of Misra and Rai teach a roaming user that travels from a first domain to another (Misra, Column 1, lines 15-35) which includes the hand-off teaching of Rai, that when the user enters a new zone or domain, *it creates a new session and deletes the old one* (Column 8, lines 36-44).

Therefore, the Examiner explicitly states that Rai discloses a hand-off technique in which (a) first the new session is created and then (b) the old session is deleted, which is not the same as ***disconnecting a user from the first one*** of the first and the second server machine ***before being connected to the second one*** of the first and the second server machine, as recited using respective language in claims 10, 18, and 21. Therefore, since Rai cannot teach or suggest the above-noted features of claims 10, 18, and 21, Rai cannot be used to cure the deficiencies of Misra.

Therefore, the applied references cannot be used to establish a prima facie case of obviousness for claims 10, 18, and 21.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection, and find claims 10, 18, and 21 allowable over the applied references. Also, at least based on their respective dependencies to claims 10, 18, and

21, claims 11-17, 19-20, 22-27, and 29-35 should be found allowable over the applied references, as well as for their additional distinguishing features.

Also, Applicants assert the dependent claims are patentable over the applied references in view of their additional combinations of features.

For example, claims 30, 32, and 35 recite additional features that distinguish over the applied references. In claims 30, 32, and 35 the "(b1) upon receiving the current access request via the second server machine, identifying a first local module previously supporting the user at the first server machine; (b2) reconfiguring the first local module at the first server machine to remove support for the user at the first server machine; (b3) identifying a second local module to support the user at the second server machine; and (b4) reconfiguring the second local module at the second server machine to add support for the user at the second server machine" features recited, using their respective language, are not explicitly or implicitly taught or suggested by the applied references.

The Examiner states on pages 5 and 6 of the Office Action that Misra does not explicitly indicate these recited features of claims 30, 32, and 35. To cure this deficiency, the Examiner states on pages 5 and 6 that Rai (Rai Col. 6, lines 38-51 and Col. 8, lines 36-44) allegedly shows this feature (emphasis added):

Rai teaches a system of a mobile user where if the user leaves the access point of a first server and enters the access of a second server (Column 6, lines 38-51), the user start issuing commands to the new server and the *system reconfigures the second server to handle the user requests* (Column 8, lines 36-44) and *deletes the user's access to the first server* (Column 8, lines 42-44) thus no access ability to the first server, than access is prevented unless the user is then reconfigured to access the first server.

Applicants respectfully disagree and assert that as the Examiner stated, Rai discloses first *reconfiguring the second server to handle the user requests* and then

*deleting the user's access to the first server.* This is not the same as first reconfiguring the first local module at the first server machine to remove support for the user at the first server machine (step b2) and then reconfiguring the second local module at the second server machine to add support for the user at the second server machine (step b4), as recited using their respective language in claims 30, 32, and 35.

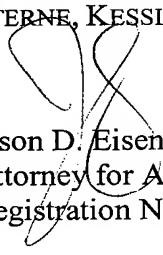
### ***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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